

United States Courts
Southern District of Texas
FILED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

DEC 31 2024

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

Vs.

Raul Munoz

CRIMINAL COMPLAINT

Case Number: **C-24-630M**

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about December 30, 2024 in Brooks County, in the Southern District of Texas, defendant, **Raul Munoz**

did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324.
I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:
Official Title

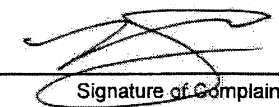
See Attached Affidavit of U.S. Border Patrol Agent

Nathan Smith

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

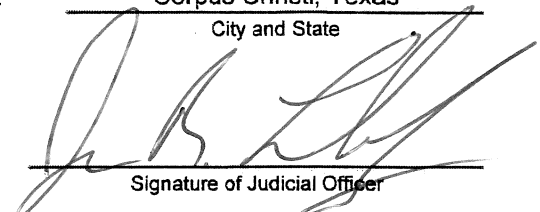
Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on the:


Signature of Complainant
Nathan Smith
Printed Name of Complainant

December 31, 2024
Date

at Corpus Christi, Texas
City and State

Jason B. Libby U.S. Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

The information contained in this report /affidavit is based upon my personal participation in the investigation, which included, but is not limited to information relayed to me by other agents and officers participating in the investigation.

FACTS/DETAILS:

On December 30, 2024, at approximately 9:30 a.m., a Border Patrol Agent (BPA) assigned to the US Border Patrol Checkpoint, near Falfurrias, Texas, encountered a red in color Ford F150 in the primary inspection lane for an immigration inspection of its occupants. The driver, later identified as Raul MUNOZ, was questioned by a Border Patrol Agent while in the primary inspection lane as to his citizenship, MUNOZ replied, "US citizen." The agent then proceeded to question the passenger, later identified as Sonia PEREZ-Rivera, as to her citizenship. PEREZ nodded yes and then looked at MUNOZ. At that point the agent asked PEREZ, in Spanish, where she was born. She replied "McAllen", and the agent followed up by asking her in which hospital she was born. PEREZ remained silent. MUNOZ was then asked, in Spanish, how they knew each other and how long they have known each other? Munoz replied by saying PEREZ was a friend that he has known for approximately one year. The agent turned back to PEREZ and asked her where she was born. PEREZ quickly looked away and shook her head in a manner of disbelief before finally saying "Hidalgo, Mexico." As the agent further questioned PEREZ about her citizenship, she eventually admitted she was illegally present in the United States. At that point, MUNOZ was then placed under arrest for alien smuggling. All subjects were escorted into the checkpoint for further processing.

NOTE: MUNOZ was arrested at the United States Border Patrol Checkpoint near Falfurrias, Texas on March 17, 2024, for attempting to smuggling an illegal alien in the same manner. MUNOZ was not charged at that time.

MIRANDA RIGHTS WARNING: All subjects were advised of their Miranda Rights in their language of preference.

PRINCIPAL STATEMENT: Rual MUNOZ


MUNOZ stated he left his home in Kennedy, Texas at approximately 6:30 a.m. because he had a doctor's appointment in Pharr, Texas at 11:30 a.m. MUNOZ stated he decided not to attend his appointment because they had not opened yet and that sometimes they open late. At that point, he decided to drive back to Kenedy, Texas and not wait for the doctor's office to open. MUNOZ stated he stopped at a gas station north of Edinburg, Texas where he saw "this lady". The agent asked MUNOZ, "Where did you meet this lady?" MUNOZ answered, saying she was over there where he was putting gas in the gas station when he was coming back. It was at this gas station he claims PEREZ approached him and asked for a ride to Falfurrias, Texas. MUNOZ agreed and they began to drive towards Falfurrias, Texas. MUNOZ stated he tried to speak to PEREZ, but she quiet and would not talk to him. MUNOZ stated PEREZ did not give him money.

MATERIAL WITNESS STATEMENT: Sonia PEREZ-Rivera

PEREZ stated she left her home in Hidalgo, Mexico on December 23, 2024, and traveled by bus for two days before arriving at a home south of the United States, Mexico border. On December 26, 2024, PEREZ and two other individuals illegally entered the United States. PEREZ stated one of the individuals guided them to a house. PEREZ stated after two days all three individuals were moved to another house. PEREZ stated this morning she was advised she was leaving. PEREZ was then taken by an unknown driver to what she believes was a gas station. The driver of that vehicle instructed PEREZ to get into the red F150 truck that she was later apprehended in. PEREZ stated during the drive MUNOZ asked her if she spoke English and that he instructed her to answer, "Yes" if Border Patrol Agents asked her if she was a United States citizen. PEREZ stated she does not know how much her family paid for her to be smuggled and that her destination was New York City, New York.

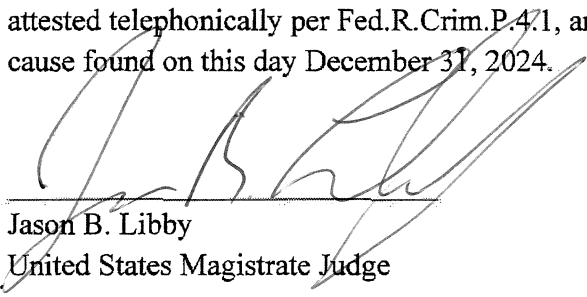
DISPOSITION:

The facts of this case were presented to the Assistant United States Attorney's Office who accepted Raul MUNOZ for prosecution of 8 USC 1324, Alien Smuggling. Sonia PEREZ-Rivera will be held as a material witness.



Nathan Smith
Border Patrol Agent

Submitted by reliable electronic means, sworn to signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on this day December 31, 2024.



Jason B. Libby
United States Magistrate Judge